

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 1

NAME OF COMMITTEE (In Full)  
Americans for Prosperity

FEC IDENTIFICATION NUMBER  
C90013285

Mailing Address 1320 North Courthouse Rd  
Suite 700

City	State	ZIP Code
ARLINGTON	VA	22201

Bradley Austin  
Senior Campaign Finance Analyst  
Federal Election Commission, Reports Analysis Division  
(202) 694-1196

June 15, 2018

Dear Mr. Austin:

We are writing in response to your Request for Additional Information ("RFAI") regarding our 2018 April Quarterly Report.

You requested additional information pertaining to the fact that this report discloses disbursements made for independent expenditures, but no contributions made to further the independent expenditures. As you note, persons who are not political committees but who make independent expenditures must identify each person who makes a contribution in excess of \$200 for the purpose of furthering the reported independent expenditure. 11 C.F.R. § 109.10(e)(1)(vi). Americans for Prosperity received no such contributions, and therefore had no contributions to report.

Further, we challenge the assumption that, simply because we reported disbursements, there were also contributions that should have been reported. This assumption is contrary to the language of the Commission's regulation cited above. And it is a waste of taxpayer and organization resources, respectively, to issue and respond to an RFAI every time a similarly-situated filer makes an independent expenditure.

Finally, we note that we did not receive this RFAI by mail or e-mail, but instead happened upon it – three days before it was due – while searching for an unrelated report on the FEC's website. Upon inquiry, we learned that the Commission does not have a mechanism to e-mail a soft copy to filers that are not registered as political committees, nor does it send via certified mail. Given the potential consequences of an untimely response, we request that the Commission re-examine its options to ensure delivery of its official requests.

Sincerely,

Victor E. Bernson  
Vice President and General Counsel  
Americans for Prosperity  
C90013285